

January 28, 2021

Genesee County Road Commission  
Board of Commissioners  
211 W. Oakley Street  
Flint, MI 48503

Dear Commissioners:

I am writing this letter to inform you about the reoccurring events that have created a hostile atmosphere in my working environment. I feel like I have been subject to insults and derogatory remarks by my boss, Managing Director, Fred Peivandi.

Please consider this a formal complaint of harassment, intimidation, retaliation, deferential treatment, and discrimination that I have been subject to under Fred Peivandi's leadership. These actions violate the Genesee County Road Commission (GCRC) Anti-Harassment and Unlawful Retaliation in the Work Place Policy and violate the Title VII of the Civil Rights Acts of 1964.

I request an early action and proper investigation of the situation. As you know, I am employed as the Genesee County Road Commission Director of Human Resources (HR) and have held this position since October 2016. I have served with passion and dedication. I have carried out my duties to the best of my ability. I have given undeniable contribution and performance and have implemented many cost-saving initiatives.

The events mentioned above started in early 2018 and has continued to escalate. In June of 2018, I was approved for FMLA disability. Fred Peivandi refused my reasonable non-hardship accommodation request. He stated, "why should I accommodate your disability when I can hire an HR Director who doesn't have a disability?" It took approximately one year before my disability accommodations was granted, and after I filed a Charge of Discrimination Claim with the Equal Employment Opportunity Commission (EEOC) for disability, race discrimination, and deferential treatment in February of 2019 and only after many meetings with GCRC's Legal Counsel and the GCRC Board. The GCRC Board intervened and said enough is enough of Fred's defiant behavior, demanding Fred Peivandi to approve my disability accommodations as he was instructed to do before I filed an EEOC complaint.

In 2019, I received a Right to Sue Letter from EEOC, but I did not pursue a lawsuit hoping that my working conditions would get better. Unfortunately, my working conditions did not get better, but only got more hostile and intimidating after filing my EEOC discrimination claim.

In March of 2019, Fred Peivandi confronted me with a look of trembling anger, accusing me of trying to sue for money. He felt that I was working against him and reiterated that he thought I was using my disability to get my way. Fred's words were not tempered but rather hostile and intimidating in nature. This situation was immediately shared with the GCRC Board and its attorney.

Throughout 2019, I was faced with continuous deferential treatment, micromanaged, usurping of my authority, ridiculed, and suffered embarrassment in the presence of my colleagues, excluded from meetings that I should have been in attendance. I have been subjected to harassing and intimidating conduct, treated unprofessionally, and avoided by Fred Peivandi.

On July 20, 2020, I, via written email correspondence, expressed my concerns to the full GCRC Board of Commissioners about Fred Peivandi having a relationship with GCRC's Executive Secretary, who for 13 years served as Fred's Executive Secretary. I shared with Fred Peivandi it was my duty to report to the Board about his relationship with the Executive Secretary because he was the Managing Director, and I felt the relationship between him and the Executive Secretary was a conflict of interest. It could interfere with employee morale and could result in legal repercussions if the relationship went sour. Fred Peivandi became so outraged with me, saying that it was nobody's business that he was having a relationship with his former Executive Secretary. He stated he did not appreciate me informing the Board of this relationship and he took my actions personal. He was verbally aggressive towards me and has made it clear to many that he wants me fired.

On July 23, 2020, a birthday card was circulated for Fred Peivandi by his Executive Secretary. A GCRC employee whose name is also Donna signed Fred's birthday card. Fred Peivandi, when he saw that a Donna had signed his card, he automatically assumed it was me. So, he took the birthday card after it was presented to him, threw it in the trash can, and said, "I hate her," referring to me. He was quickly told that I was not the Donna that signed his birthday card. How can I be treated fairly by a boss who has declared that he hates me and constantly insults me, and continually tries to find ways to terminate my employment?

On September 21 and October 8, 2020, I gave testimony via deposition in a discrimination and deferential treatment lawsuit filed against the Road Commission by GCRC Director of Maintenance, Anthony Branch. Due to the above mentioned treatment that I have been subjected to under the leadership of Fred Peivandi, I stated for the record in both my deposition proceedings, that I feared being subjected to reprisal by Managing Director, Fred Peivandi, as a result of the testimony I might share that may not be favorable to Mr. Peivandi or the Genesee County Road Commission. Fred Peivandi was a spectator during both my Zoom depositions, and immediately, following my depositions, Fred Peivandi's hostile and intimidating behavior towards me only escalated to a higher degree.

He has been publically hostile towards me in staff meetings. He continues to be abrasive and makes insulting, offensive remarks towards me. He has called into question my integrity and accusing me of being bias in front of my coworkers. Fred Peivandi repeatedly makes unapologetic false allegations against me and subjects me to deferential treatment and discrimination.

My greatest fears of being retaliated against by Managing Director, Fred Peivandi for my participation in giving testimony during the deposition proceedings in the Anthony Branch lawsuit manifested on Thursday, January 19, 2021. Fred Peivandi and I were having a phone

conversation germane to GCRC business. During this conversation, he became upset with me and began to verbally insult me for the testimony I gave in my depositions. He made it clear that he did not appreciate what I said about him in my deposition and said he did not trust me, and he took my testimony as a personal attack against him. I do have witnesses who can collaborate on this conversation.

Fred Peivandi's actions resulted in me feeling intimidated, threaten, and violated. His verbally expressed anger towards me about my deposition testimony confirmed that I was being subjected to repeated insults, verbal abuse, harassment, intimidation, discrimination, and differential treatment because I participated in a protective activity, that GCRC should have provided me protection from.

I immediately contacted GCRC's Labor Attorney concerning this situation and my concerns. I also contacted Attorney Andrew Cascini, who is representing GCRC in the Anthony Branch lawsuit. However, his office is closed due to the COVID-19 Pandemic. I left a message on his contact number and have not received a returned call as requested.

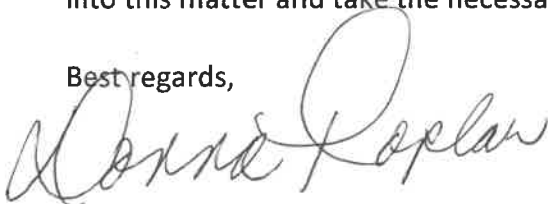
There have been many complaints filed against Fred Peivandi by GCRC employees for race and gender discrimination; these complaints seem as though they fell on deaf ears. There simply has been no corrective resolution for Fred's behavior. It is obvious that Fred Peivandi has the mindset that as GCRC Manager Director, he is above reproach, above the employment laws of this country, and above GCRC policies.

I want to point out that these repeated instances of harassment, intimidation, and verbal abuse have caused me stress and anxiety, and they have been affecting my performance at work. It's very frustrating to come to work daily, not knowing when I will be harassed and violated by Fred Peivandi. It is my job as the Director of HR to protect GCRC employees from being discriminated against and harassed, and yet I find myself being victimized by that which I am to protect others from.

Today, I feel like I am the George Floyd of GCRC, and Fred Peivandi has his knee on my neck, and I am crying out, "I Can Not Breath."

The events I have expressed in this correspondence are serious. I would appreciate you instructing GCRC Labor relation's Attorney Tom Derderian to conduct a thorough investigation into this matter and take the necessary corrective actions.

Best regards,

A handwritten signature in cursive script, appearing to read "Donna Poplar".

Donna Poplar  
5277 Kimberly Woods Circle  
Flint, MI 48504